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Attorneys for Plaintiff
ROYA SAGHAFI

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES, CENTRAL DISTRICT

ROYA SAGHAFI, an individual,

Plaintiff,

vs.

PALISADES CHARTER HIGH
SCHOOL, a corporation; AMY NGUYEN,
an individual; and DOES 1 through 10

Defendants.

Case No.: BC708497

**DECLARATION OF ANN A. HULL ISO
MOTION TO CONTINUE TRIAL**

Date: June 24, 2019
Time: 8:30 a.m.
Dept.: 72
Judge: Ruth Ann Kwan
Reservation No.: 037381681604

DECLARATION OF ANN A. HULL

I, Ann A. Hull, declare as follows:

1. I am an attorney at law duly licensed to practice before this Court. I am an attorney with the Law Offices of Ann A. Hull, Inc., counsel for plaintiff Roya Saghafi (“Saghafi”) in the above-captioned matter. I have personal knowledge of the facts contained herein. If called upon as a witness to testify, I could and would competently testify to each of the facts set forth herein.

2. This lawsuit involves a high school and there are dozens of witnesses that must be deposed. Additional discovery is needed in the interests of justice and of judicial economy.
3. This lawsuit was filed on June 1, 2018.
4. On July 25, 2018, Plaintiff propounded written discovery.
5. The trial date was set on October 2, 2018.
6. On December 10, 2018, I served a notice of deposition of Person Most Knowledgeable on Defendants. The deposition was to take place on January 28, 2019. I offered that if this date did not work for opposing counsel, alternative dates should be provided. A true and accurate copy of the Notice of deposition is attached hereto as Exhibit "1."
7. On December 24, 2018, additional written discovery was propounded on Defendant Palisades Charter High School.
8. Defendants produced documents that were bates stamped NGUYEN 000001-000196.
9. On January 15, 2019, Ellen E. Cohen, Counsel for Defendants emailed "*we will insist that Ms. Saghafi's deposition be taken before any PCHS depositions.*" Defendants also suggested holding off on discovery. A true and accurate copy of the email is attached hereto as Exhibit "2."
10. On January 15, 2019, I replied that "Ms. Saghafi does not want to hold off on discovery" and requested that Ms. Cohen coordinate scheduling the deposition with Hannah Robinson, Esq. who was working with me on the case at the time. A true and accurate copy of the email is attached hereto as Exhibit "3."
11. On January 22, 2019, Ms. Cohen confirmed "I will coordinate with Hannah." A true and accurate copy of the email is attached hereto as Exhibit "4."
12. As a high school science teacher who wanted to avoid requiring a substitute teacher to be brought into her class, Ms. Saghafi recommended scheduling depositions for spring break.

- 1 13. On January 22, 2019, Ms. Robinson suggested April 15-17 as dates for Plaintiff's
2 deposition to Ms. Cohen. "I will coordinate with Hannah." A true and accurate copy of the
3 email is attached hereto as Exhibit "5."
- 4 14. On February 8, 2019, Defendant Palisades Charter High School served their responses to
5 Plaintiff's written discovery. However, no documents were included.
- 6 15. On February 11, 2019, Ms. Cohen emailed that she was going on a "pre-planned spring
7 break trip with my children April 13-16." A true and accurate copy of the email is
8 attached hereto as Exhibit "6."
- 9 16. On March 8th and March 11, 2019, Plaintiff's counsel hired First Document Retrieval to
10 obtain reports from Shaw Institute and From Allison _____ and Associates. Although
11 these documents were responsive to Plaintiff's written discovery, Defendants had not
12 produced them.
- 13 17. On March 9, 2019, Ms. Cohen proposed April 22-24, 2019, for the PMK deposition. A
14 true and accurate copy of the email is attached hereto as Exhibit "7."
- 15 18. Plaintiff's deposition was taken on April 17-19, 2019.
- 16 19. The PMK deposition was set for April 24, 2019.
- 17 20. On April 23, 2019, at 3:49 p.m. (the day before the PMK deposition) Ms. Cohen emailed
18 "In anticipation of tomorrow's deposition, please find attached PCHS's supplemental
19 document production. Attached were documents marked as PCHS 001739 to 002009.
20 Documents 000001 through 001738 were not included and never had been produced." A
21 true and accurate copy of the email is attached hereto as Exhibit "8."
- 22 21. On April 23, 2019, at 8:44 p.m. (the day before the PMK deposition) I replied to Ms.
23 Cohen: "I note from the numbers on the bats documents that it appears that Defendants
24 have withheld hundreds of documents. Please provide us with the bates numbers of the
25 documents that are being withheld so that we can confirm that we are not missing
26 anything." A true and accurate copy of the email is attached hereto as Exhibit "9."
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- 1 22. On April 24, 2019, at 11:05 a.m. (during the PMK deposition) an email was sent from a
2 person at Defendants' law firm with a purported link to documents. A true and accurate
3 copy of the email is attached hereto as Exhibit "10."
- 4 23. After receiving the email, I repeatedly attempted to access the link and was repeatedly
5 denied access.
- 6 24. Throughout April until the present time, I have repeatedly spoken with Ellen Cohen
7 concerning the documents that are being withheld from Plaintiff.
- 8 25. On May 12, 2019, I composed a letter seeking dates on which to conduct the depositions
9 of 24 percipient witnesses. A true and accurate copy of the letter is attached hereto as
10 Exhibit "12."
- 11 26. On May 13, 2019, I received the transcript for the PMK Deposition. A true and accurate
12 copy of the email is attached hereto as Exhibit "11." This deposition transcript identified
13 witnesses that need to be deposed.
- 14 27. On May 14, 2019, I noticed the depositions of Dr. Lee and Dr. Magee. A true and accurate
15 copy of the letter is attached hereto as Exhibit "13."
- 16 28. On May 29, 2019, The Honorable Elizabeth White continued a trial in LASC Case
17 number BC688647, filed in 2017, to August 15, 2019, with the Final Status Conference on
18 August 12, 2017. The continued trial dates were made without any input from Plaintiff's
19 or Defendants' counsel in that case. This schedule makes it impossible to competently try
20 both cases in such a short time.
- 21 29. On June 5, 2019, I composed a meet and confer letter to defendants concerning the
22 scheduling of depositions and asking if the defendants would stipulate to continuing the
23 date of the trial. A true and accurate copy of the letter is attached hereto as Exhibit "14."
- 24 30. I was out of state attending the Trial Layers College from June 7-14, 2019. This event had
25 been scheduled for close to a year.
- 26 31. On June 16, 2019, I composed another letter to defendants concerning the missing
27 documents. A true and accurate copy of the letter is attached hereto as Exhibit "15."
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- 1 32. On June 18, 2019, I composed another letter to defendants concerning the missing
2 documents. A true and accurate copy of the letter is attached hereto as Exhibit "16."
- 3 33. I am counsel of record for the 14-year-old accused of being the shooter in the Highland
4 High school shooting case, case number MJ24285. A Transfer hearing in that case began
5 on May 8, 2017, and is set to be completed on June 21, 2019. Based on statements made
6 by the Honorable Denise MacGlaughlin-Bennett, I anticipate that the minor will be held
7 over to appear for an adjudication (juvenile trial) in late July of 2019. This will directly
8 conflict with the current trial date in this case.
- 9 34. The Honorable Elizabeth White also recently changed a trial date (without input of
10 Plaintiff's counsel as to the date) in a case filed in 2017. It is now set to start August 15,
11 2019, with an FSC on August 12, 2019. Necessary trial prep needs to take place during
12 the time presently set for this trial.
- 13 35. Trial in this matter is set for August 15, 2019 with an FSC on August 12, 2019. There is
14 insufficient time for Saghafi to bring a noticed motion to continue the trial.
- 15 36. For the reasons stated herein Plaintiff respectfully requests a continuance of trial and of
16 the discovery cut-off time, with the trial date to start between September 5, 2019, to
17 September 30, 2019, or at a time thereafter that is convenient to the Court.
- 18 37. On June 20, 2019, at approximately 9:00 p.m., I emailed defense counsel
19 (Ellen.Cohen@Jacksonlewis.com), informing Ms. Cohen that an ex parte hearing in the
20 matter of Saghafi v. Palisades Charter High School, Case no. BC708497, will take place
21 on June 24, 2019 at 8:30 a.m., in Dept. 72 of the Los Angeles County Superior Court
22 located at 111 N. Hill Street, Los Angeles, CA 90012. I further informed her that the
23 Court will hear my application for a trial continuance or, in the alternative, an order
24 shortening time to hear a noticed motion. I also asked her to let me know if someone will
25 attend the hearing and whether they oppose the application, so that I can inform the
26 court. The email was not returned as undeliverable.
- 27
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1 I declare under penalty of perjury under the laws of the State of California that the
2 foregoing is true and correct. Executed this 20th day of June in Woodland Hills, California.

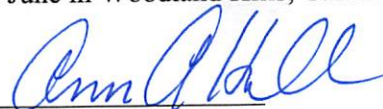
3
4 /s 
5 Ann A. Hull

EXHIBIT “1”

Ann A. Hull SBN: 252855
Hannah J. Robinson SBN: 304481
LAW OFFICES OF ANN A. HULL, INC.
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Attorneys for Plaintiff

ROYA SAGHAFI

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES, CENTRAL DISTRICT

ROYA SAGHAFI, an individual,
Plaintiff,

vs.

PALISADES CHARTER HIGH
SCHOOL, a corporation; AMY NGUYEN,
an individual; and DOES 1 through
10 Defendants.

Case No.: BC708497
Assigned to: Ruth Ann Kwan
Dept: 72

**NOTICE OF DEPOSITION OF PERSON
MOST KNOWLEDGEABLE OF PALISADES
CHARTER HIGH SCHOOL AND REQUEST
FOR PRODUCTION OF DOCUMENTS [RE:
GENERALLY, HARASSMENT,
DISCRIMINATION, RETALITION,
BULLYING, AND INVESTIGATION]**

Date: January 28, 2019
Time: 10:00 AM
Location: Law Offices of Ann A. Hull, Inc.
21900 Burbank Blvd., 3rd Floor
Woodland Hills, CA 91367

1 TO ALL INTERESTED PARTIES AND THEIR ATTORNEYS OF RECORD:
2 PLEASE TAKE NOTICE THAT pursuant to Code of Civil Procedure section 2025 *et seq.*
3 Plaintiff ROYA SAGHAFI will take the deposition referred to herein on **January 28, 2019**, at
4 **10:00 AM** at Law Offices of Ann A. Hull, Inc., 21900 Burbank Blvd., 3rd Floor, Woodland Hills,
5 CA 91367; (818) 992-2924; and will continue from day to day, excluding Saturdays, Sundays
6 and legal holidays, until completed. Said deposition shall be conducted of the **Person Most**
7 **Knowledgeable** of PALISADES CHARTER HIGH SCHOOL with the respect to each of the
8 following categories listed herein.

9 PLEASE TAKE FURTHER NOTICE that pursuant to California Code of Civil Procedure
10 §§ 2025.220 *et seq.*, you are hereby notified that Plaintiff intends to record the testimony by
11 stenographic method which might include instant visual display of the testimony and/or through
12 the use of video technology in a manner in compliance with the Code.

13 If the deponent will require the services of an interpreter, you must advise this office in
14 writing no later than ten (10) days before the date set for the deposition of both the need for an
15 interpreter and the language that will be required. Defendants will seek monetary sanctions
16 against counsel and/or the deponent(s) if the deposition is continued as a result of failure to
17 request an interpreter and/or specify the relevant language.

18 NOTICE IS FURTHER GIVEN that the interpreter will charge a cancellation fee if the
19 deposition is cancelled less than 24 hours prior to its scheduled commencement, and the
20 cancelling party will be responsible for the cancellation fee.

21 **MATTERS OF EXAMINATION**

22 For the entire period of ROYA SAGHAFI's employment and/or association with
23 PALISADES CHARTER HIGH SCHOOL, commencing with the date of PALISADES
24 CHARTER HIGH SCHOOL's first contact with ROYA SAGHAFI, through the commencement
25 of this deposition proceeding, ROYA SAGHAFI shall examine on:

26 **MATTER OF EXAMINATION NO. 1:**

27 Defendant PALISADES CHARTER HIGH SCHOOL's (written and/or unwritten) rules,
28 procedures, policies, and practices, which pertain, concern, or relate to each of the following
personnel issues:

- 29 a) Reporting discrimination, harassment, retaliation and/or bullying at work.
- 30 b) Responsive actions to be taken upon awareness by PALISADES CHARTER

**NOTICE OF DEPOSITION OF PMK OF PALISADES CHARTER HIGH SCHOOL AND
REQUEST FOR PRODUCTION OF DOCUMENTS [RE: GENERALLY,
HARASSMENT, DISCRIMINATION, RETALITION, BULLYING, AND
INVESTIGATION]**

1 HIGH SCHOOL of any alleged discrimination, harassment, retaliation and/or bullying at
2 work and the timeliness of when such actions are to be taken.

3 **MATTER OF EXAMINATION NO. 2:**

4 The written anti-harassment policy of PALISADES CHARTER HIGH SCHOOL, if any,
5 at all times during ROYA SAGHAFI's employment there.

6 **MATTER OF EXAMINATION NO. 3:**

7 The manner in which the written anti-harassment policy of PALISADES CHARTER
8 HIGH SCHOOL, if any, was distributed to employees at all times during ROYA SAGHAFI's
9 employment there.

10 **MATTER OF EXAMINATION NO. 4:**

11 The dates on which the written anti-harassment policy of PALISADES CHARTER HIGH
12 SCHOOL, if any, was distributed to employees at all times during ROYA SAGHAFI's
13 employment there.

14 **MATTER OF EXAMINATION NO. 5:**

15 Defendant PALISADES CHARTER HIGH SCHOOL's (written and/or unwritten) rules,
16 procedures, policies, and practices, which pertain, concern, or relate to each of the following
17 personnel issues:

- 18 a) Investigating complaints of harassment, discrimination, bullying, and retaliation.
- 19 b) Interviewing the complaining party concerning any report of harassment,
20 discrimination, bullying, and retaliation.
- 21 c) Interviewing witnesses concerning any report of harassment, discrimination,
22 bullying, and retaliation.
- 23 d) Informing the complaining party's supervisor about reports of harassment,
24 discrimination, bullying, and retaliation.
- 25 e) Informing the supervisor of the alleged victim of harassment, discrimination,
26 bullying, and retaliation, about the report of harassment, discrimination, bullying, and retaliation.
- 27 f) Preservation of work site photos, video, digital images, CCTV recordings, or all
28 manner in which images may be recorded that may be relevant to any report of harassment,
discrimination, bullying, and retaliation.

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1 g) The review of work site photos, video, digital images, CCTV recordings, or all
2 manner in which images may be recorded that may be relevant to any report of harassment,
3 discrimination, bullying, and retaliation.

4 h) The preparation of a report based on information if any, you collected, reviewed
5 and analyzed during the investigation, if any.

6 **MATTER OF EXAMINATION NO. 6:**

7 Defendant PALISADES CHARTER HIGH SCHOOL's (written and/or unwritten) rules,
8 procedures, policies, and practices, which pertain, concern, or relate to each of the following:

- 9 a) The manner of selection of a person to investigate reports of harassment,
10 discrimination, bullying, and retaliation.
11 b) The required qualifications of the investigator.
12 c) The required minimum training of the investigator.
13 d) The documents that should typically be reviewed in the course of an investigation
14 into reports of harassment, discrimination, bullying, and retaliation.
15 e) Remedial measures to be taken following an investigation into reports of
16 harassment, discrimination, bullying, and retaliation.

17 **MATTER OF EXAMINATION NO. 7:**

18 The manner in which PALISADES CHARTER HIGH SCHOOL selected any and all
19 persons, to investigate reports of harassment, discrimination, bullying, and retaliation of ROYA
20 SAGHAFI at any time.

21 **MATTER OF EXAMINATION NO. 8:**

22 The names, addresses, email addresses, and phone numbers of any and all persons which
23 PALISADES CHARTER HIGH SCHOOL caused to investigate reports of harassment,
24 discrimination, bullying, and retaliation of ROYA SAGHAFI at any time.

25 **MATTER OF EXAMINATION NO. 9:**

26 The training and qualifications of any and all persons that PALISADES CHARTER
27 HIGH SCHOOL caused to investigate reports of harassment, discrimination, bullying, and
28 retaliation of ROYA SAGHAFI at any time.

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1 **MATTER OF EXAMINATION NO.10:**

2 The documents that any and all persons that PALISADES CHARTER HIGH SCHOOL
3 caused to investigate reports of harassment, discrimination, bullying, and retaliation of ROYA
4 SAGHAFI at any time, reviewed in the course of his or her investigation, if any.

5 **MATTER OF EXAMINATION NO. 11:**

6 Any remedial measures that were taken following any investigation into reports of
7 harassment, discrimination, bullying, and retaliation of ROYA SAGHAFI.

8 **MATTER OF EXAMINATION NO. 12:**

9 Any and all training that PALISADES CHARTER HIGH SCHOOL provided to its
10 administrators between January 1, 2015, and the present, concerning or related to unlawful
11 discrimination, harassment, retaliation, and/or bullying any time, and: (1) the name of the
12 company, government entity, or person who provided such training; (2) the date(s) and times
13 when such training was held; (3) the entity or person who paid for any such training; (4) the cost
14 of any such training; (5) the places all such trainings were held; (6) the persons who attended such
15 training, (6) any and all certificates or other documents that were provided to any people at the
16 completion of such training; and, (6) the topics that were covered during the training.

17 **MATTER OF EXAMINATION NO. 13:**

18 Any training that PALISADES CHARTER HIGH SCHOOL provided to any and all
19 employees between January 1, 2015, and the present, and who supervised ROYA SAGHAFI
20 concerning and/or related to unlawful discrimination, harassment, retaliation, and bullying at any
21 time, if at all, and: (1) the name of the company, government entity, or person who provided such
22 training; (2) the date(s) and times when such training was held; (3) the entity or person who paid
23 for any such training; (4) the cost of any such training; (5) the places all such trainings were held;
24 (6) the persons who attended such training, (6) any and all certificates or other documents that
25 were provided to any people at the completion of such training; and, (6) the topics that were
26 covered during the training.

27 **MATTER OF EXAMINATION NO. 14:**

28 The names, addresses, and phone numbers of any and all people who performed work for
PALISADES CHARTER HIGH SCHOOL, between January 1, 2015, and December 1, 2018,
who complained about discrimination, harassment, bullying, and/or retaliation at work.

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**NOTICE OF DEPOSITION OF PMK OF PALISADES CHARTER HIGH SCHOOL AND
REQUEST FOR PRODUCTION OF DOCUMENTS [RE: GENERALLY,
HARASSMENT, DISCRIMINATION, RETALITION, BULLYING, AND
INVESTIGATION]**

1 **MATTER OF EXAMINATION NO. 15:**

2 The actions taken by PALISADES CHARTER HIGH SCHOOL in response to the
3 complaints of all people who performed work for PALISADES CHARTER HIGH SCHOOL,
4 between January 1, 2015, and January 1, 2019, who complained about discrimination,
5 harassment, bullying, and/or retaliation at work. harassment, bullying, and/or retaliation at work.

6 **MATTER OF EXAMINATION NO. 16:**

7 The circumstances (who, what, when, where, how, and why) of any investigation
8 conducted by or on behalf of PALISADES CHARTER HIGH SCHOOL into PLAINTIFF's
9 complaints bullying, harassment, discrimination, and/or retaliation, at any and all times.

10 **MATTER OF EXAMINATION NO. 17:**

11 Any training that PALISADES CHARTER HIGH SCHOOL provided to **Amy Nguyen**
12 concerning or related to unlawful discrimination, harassment, and retaliation at any time, if at all,
13 and: (1) the name of the company, government entity, or teacher who provided such training to
14 **Amy Nguyen**; (2) the date(s) and times on which **Amy Nguyen** received such training; (3) the
15 entity or person who paid for any such training; (4) the cost of any such training; (5) any
16 certificates or other documents that were provided to PALISADES CHARTER HIGH SCHOOL
17 and/or to **Amy Nguyen** at the completion of such training; and, (6) the topics that were covered
18 during the training.

19 **DOCUMENTS TO BE PRODUCED**

20 PLEASE TAKE FURTHER NOTICE that you are hereby required pursuant to CCP §
21 2025.220 to bring with you to this proceeding:

22 1. All documents within the meaning of California Evidence Code §250 reviewed by
23 the deponent(s) in preparation for their deposition.

24 2. All documents within the meaning of California Evidence Code §250 that pertain
25 or relate to PALISADES CHARTER HIGH SCHOOL's (written and/or unwritten) rules,
26 procedures, policies, and practices concerning:

- 27 a) Reporting discrimination, harassment, retaliation and/or bullying at work.
28 b) Responsive actions to be taken upon awareness by the company of any
29 alleged discrimination, harassment, retaliation and/or bullying at work and the timeliness
30 of when such actions are to be taken.

31 - 6 -

32 **NOTICE OF DEPOSITION OF PMK OF PALISADES CHARTER HIGH SCHOOL AND
33 REQUEST FOR PRODUCTION OF DOCUMENTS [RE: GENERALLY,
34 HARASSMENT, DISCRIMINATION, RETALITION, BULLYING, AND
35 INVESTIGATION]**

1 3. All documents within the meaning of California Evidence Code §250 that pertain
2 or relate to PALISADES CHARTER HIGH SCHOOL's written anti-harassment policy, if any, at
3 all times during ROYA SAGHAFI's employment there.

4 4. All documents within the meaning of California Evidence Code §250 that pertain
5 or relate to the manner in which the written anti-harassment policy of PALISADES CHARTER
6 HIGH SCHOOL, if any, was distributed to employees at all times during ROYA SAGHAFI'S
7 employment there.

8 5. All documents within the meaning of California Evidence Code §250 that pertain
9 or relate to the dates on which the written anti-harassment policy of PALISADES CHARTER
10 HIGH SCHOOL, if any, was distributed to employees at all times during ROYA SAGHAFI'S
11 employment there.

12 6. All documents within the meaning of California Evidence Code §250 that pertain
13 or relate to PALISADES CHARTER HIGH SCHOOL's (written and/or unwritten) rules,
14 procedures, policies, and practices concerning investigating complaints of harassment,
15 discrimination, bullying, and retaliation.

16 7. All documents within the meaning of California Evidence Code §250 that pertain
17 or relate to PALISADES CHARTER HIGH SCHOOL's (written and/or unwritten) rules,
18 procedures, policies, and practices concerning interviewing the complaining party concerning any
19 report of harassment, discrimination, bullying, and retaliation.

20 8. All documents within the meaning of California Evidence Code §250 that pertain
21 or relate to PALISADES CHARTER HIGH SCHOOL's (written and/or unwritten) rules,
22 procedures, policies, and practices concerning informing the complaining party's supervisor
23 about reports of harassment, discrimination, bullying, and retaliation.

24 9. All documents within the meaning of California Evidence Code §250 that pertain
25 or relate to PALISADES CHARTER HIGH SCHOOL's (written and/or unwritten) rules,
26 procedures, policies, and practices concerning informing the supervisor of the alleged victim of
27 harassment, discrimination, bullying, and retaliation, about the report of harassment,
28 discrimination, bullying, and retaliation.

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1 10. All documents within the meaning of California Evidence Code §250 that pertain
2 or relate to PALISADES CHARTER HIGH SCHOOL's (written and/or unwritten) rules,
3 procedures, policies, and practices concerning the preservation of work site photos, video, digital
4 images, audio recordings, CCTV recordings, and/or all manner in which images may be recorded
5 that may be relevant to any report of harassment, discrimination, bullying, and retaliation.

6 11. All documents within the meaning of California Evidence Code §250 that pertain
7 or relate to PALISADES CHARTER HIGH SCHOOL's (written and/or unwritten) rules,
8 procedures, policies, and practices concerning the review of work site photos, video, digital
9 images, CCTV recordings, audio recordings, or all manner in which images may be recorded that
10 may be relevant to any report of harassment, discrimination, bullying, and retaliation.

11 12. All documents within the meaning of California Evidence Code §250 that pertain
12 or relate to PALISADES CHARTER HIGH SCHOOL's (written and/or unwritten) rules,
13 procedures, policies, and practices concerning the preparation of a report based on information if
14 any, you collected, reviewed and analyzed during the investigation, if any.

15 13. All documents within the meaning of California Evidence Code §250 that pertain
16 or relate to PALISADES CHARTER HIGH SCHOOL's (written and/or unwritten) rules,
17 procedures, policies, and practices concerning its manner of selection of a person to investigate
18 reports of harassment, discrimination, bullying, and retaliation.

19 14. All documents within the meaning of California Evidence Code §250 that pertain
20 or relate to PALISADES CHARTER HIGH SCHOOL's (written and/or unwritten) rules,
21 procedures, policies, and practices concerning your minimum required qualifications of the
22 investigator to investigate reports of harassment, discrimination, bullying, and retaliation.

23 15. All documents within the meaning of California Evidence Code §250 that pertain
24 or relate to PALISADES CHARTER HIGH SCHOOL's (written and/or unwritten) rules,
25 procedures, policies, and practices that were in effect while ROYA SAGHAFI was employed at
26 PALISADES CHARTER HIGH SCHOOL, concerning documents that should be reviewed in the
27 course of any investigation into reports of harassment, discrimination, bullying, and retaliation.

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1 16. All documents within the meaning of California Evidence Code §250 that pertain
2 or relate to PALISADES CHARTER HIGH SCHOOL's (written and/or unwritten) rules,
3 procedures, policies, and practices that were in effect at all times while ROYA SAGHAFI was
4 employed at PALISADES CHARTER HIGH SCHOOL concerning remedial measures to be
5 taken following an investigation into reports of harassment, discrimination, bullying, and
6 retaliation.

7 17. All documents within the meaning of California Evidence Code §250 that pertain
8 or relate to the manner by which PALISADES CHARTER HIGH SCHOOL selected any and all
9 persons, if any, to investigate reports of harassment, discrimination, bullying, and retaliation of
10 ROYA SAGHAFI at any time.

11 18. All documents within the meaning of California Evidence Code §250 that pertain
12 or relate to the training and qualifications of any and all persons that PALISADES CHARTER
13 HIGH SCHOOL caused to investigate reports of harassment, discrimination, bullying, and
14 retaliation of ROYA SAGHAFI at any time.

15 19. All documents within the meaning of California Evidence Code §250 that
16 any and all persons, if any, that PALISADES CHARTER HIGH SCHOOL caused to investigate
17 reports of harassment, discrimination, bullying, and retaliation of ROYA SAGHAFI at any time,
18 reviewed in the course of his or her investigation.

19 20. All documents within the meaning of California Evidence Code §250 that relate to
20 any remedial measures that were taken following any investigation into reports of harassment,
21 discrimination, bullying, and retaliation of ROYA SAGHAFI.

22 21. All documents within the meaning of California Evidence Code §250 by which
23 PALISADES CHARTER HIGH SCHOOL was put on notice that ROYA SAGHAFI believed
24 she was being subjected to harassment, discrimination, bullying, physical assault, and/or
25 retaliation at any time.

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1 22. All documents within the meaning of California Evidence Code §250 that relate to
2 any and all training that PALISADES CHARTER HIGH SCHOOL provided to its administrators
3 at all times between January 1, 2015, and the present, concerning or related to unlawful
4 discrimination, harassment, retaliation, violence, and/or bullying any time, if at all, and: (1) the
5 name of the company, government entity, or person who provided such training; (2) the date(s)
6 and times when such training was held; (3) the entity or person who paid for any such training;
7 (4) the cost of any such training; (5) the places all such trainings were held; (6) the persons who
8 were present at such training(s); (7) any certificates or other documents that were provided to any
9 one at the completion of such training; and, (8) the topics that were covered during the training.

10 23. All documents within the meaning of California Evidence Code §250 that relate to
11 any and all training that PALISADES CHARTER HIGH SCHOOL provided to any and all
12 employees, who supervised ROYA SAGHAGI at any time, concerning and/or related to unlawful
13 discrimination, harassment, bullying, retaliation, and wage and hour laws at any time, if at all,
14 and: (1) the name of the company, government entity, or person who provided such training; (2)
15 the date(s) and times when such training was held; (3) the entity or person who paid for any such
16 training; (4) the cost of any such training; (5) the places all such trainings were held; and, (6) any
17 certificates or other documents that were provided to supervisors and/or managers at the
18 completion of such training; (7) the persons who attended the training(s); and, (8) the topics that
19 were covered during the training.

20 24. All documents within the meaning of California Evidence Code §250 that relate to
21 the actions, if any, taken by PALISADES CHARTER HIGH SCHOOL in responses to the
22 complaints of all people who performed work at PALISADES CHARTER HIGH SCHOOL,
23 between January 1, 2015, and January 1, 2019, who complained about discrimination,
24 harassment, bullying, and/or retaliation at work.

25 25. All documents within the meaning of California Evidence Code §250 that relate to
26 the circumstances (who, what, when, where, how, and why) of any investigation conducted by or
27 on behalf of PALISADES CHARTER HIGH SCHOOL into PLAINTIFF's complaints related to
28 bullying, harassment, discrimination, assault, and/or retaliation, at any and all times.

//

//

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1 26. All documents within the meaning of California Evidence Code §250 that relate to
2 any training that PALISADES CHARTER HIGH SCHOOL provided to **Amy Nguyen**
3 concerning or related to unlawful discrimination, harassment, and retaliation at any time, if at all,
4 and: (1) the name of the company, government entity, or teacher who provided such training to
5 **Amy Nguyen**; (2) the date(s) and times on which **Amy Nguyen** received such training; (3) the
6 entity or person who paid for any such training; (4) the cost of any such training; (5) any
7 certificates or other documents that were provided to PALISADES CHARTER HIGH SCHOOL
8 and/or to **Amy Nguyen** at the completion of such training; (6) the topics that were covered during
9 the training.

10 27. All documents within the meaning of California Evidence Code §250 that
11 constitute and/or contain audio recordings, digital images, digital recordings, videos, and images
12 captured on any camera (film or digital and regardless of their form) which include ROYA
13 SAGAFI's image and/or voice therein, that PALISADES CHARTER HIGH SCHOOL reviewed
14 as a part of any investigation into any complaint or report made by ROYA SAGHAFI at any time.

15 Dated: December 9, 2018

LAW OFFICES OF ANN A. HULL, INC.

16
17 By: 

18 Ann A. Hull
19 Hannah J. Robinson
20 Attorneys for Plaintiff,
21 ROYA SAGHAFI
22
23
24
25
26
27

PROOF OF SERVICE

I am a resident of the State of California over the age of eighteen year, and not a party to the within action. My business address is: LAW OFFICES OF ANN A. HULL, INC., 21900 Burbank Blvd., 3rd Floor, Woodland Hills, California 91367. On **December 10, 2018** I served the within documents:

**NOTICE OF DEPOSITION OF PMK OF PALISADES CHARTER HIGH SCHOOL
AND REQUEST FOR PRODOUTION OF DOCUMENTS [RE: GENERALLY,
HARASSMENT, DISCRIMINATION, RETALIATION, BULLYING,
AND INVETIGATION]**

— by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m.
— by personally delivering the document(s) listed above to the person(s) at the address(es) set forth below.
 X by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in United States mail in the State of California at Woodland Hills, addressed as set forth below & **BY EMAIL.**

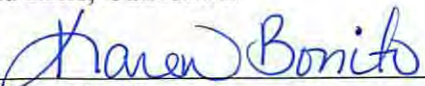
Theresa M. Marchlewski
Ellen E. Cohen
JACKSON LEWIS P.C.
725 South Figueroa Street, Suite 2500
Los Angeles, CA. 90017-5408
Fax: (213) 698-0430
Theresa.marchlewski@jacksonlewis.com
Ellen.cohen@jacksonlewis.com

Attorneys for Defendants

I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after the date of deposit for mailing in affidavit.

I declare under the penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on **December 10, 2018** at Woodland Hills, California.



Karen Bonito

EXHIBIT “2”

^_Saghafi^_ v. Palisades Charter High School

From: Cohen, Ellen E. (LA) (Ellen.Cohen@Jacksonlewis.com)

To: hull_ann@yahoo.com

Date: Tuesday, January 15, 2019, 8:50 AM PST

Ann:

Please be advised that the PMK for Palisades Charter High School is not available for deposition on 1/28 as noticed by your office. In addition, as you know, we previously noticed Ms. Saghafi's deposition, which your office advised she was unavailable for. Therefore, we will insist that Ms. Saghafi's deposition be taken before any PCHS depositions.

You and I previously discussed placed a hold on discovery and depositions pending mediation. My client remains amenable to that and I think it's a good idea, especially given that the parties have completed an initial round of written discovery. Please let me know whether you have had a chance to consider putting a hold on all pending discovery (including depositions) pending mediation. Also, please let me know your thoughts on Diane Wayne or Steve Cerveris.

Thanks!

Ellen E. Cohen

Attorney at Law

Jackson Lewis P.C.

725 South Figueroa Street

Suite 2500

Los Angeles, CA 90017

Direct: (213) 630-8240 | Main: (213) 689-0404

Ellen.Cohen@Jacksonlewis.com | www.jacksonlewis.com

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EXHIBIT “3”

Re: ^_Saghafi^_ v. Palisades Charter High School

From: ann hull (hull_ann@yahoo.com)

To: Ellen.Cohen@Jacksonlewis.com; hannahjune.esq@gmail.com; hull_ann@yahoo.com

Bcc: shaparak007@aol.com

Date: Tuesday, January 15, 2019, 7:35 PM PST

Hi Ellen,

I am including Hannah Robinson, an attorney at my firm, on this email. Hannah handles our Plaintiff's depositions. We like to start them on Mondays and reserve the next two days in case the deposition goes more than one day. Please coordinate Ms. Saghafi's deposition scheduling with Hannah.

Ms. Saghafi does not want to hold off on discovery and is feels that any out of court resolution should begin with discussions between counsel. She does not believe it is appropriate at this time to commit money to mediation until she knows what is the school had in mind. She has expressed that each year she continues teaching at the school will result in increased retirement for her.

If you have any questions, please feel free to reach out to me.

Sincerely,

Ann Hull

cc: Roya Saghafi

[Sent from Yahoo Mail for iPhone](#)

On Tuesday, January 15, 2019, 8:50 AM, Cohen, Ellen E. (LA) <Ellen.Cohen@Jacksonlewis.com> wrote:

Ann:

Please be advised that the PMK for Palisades Charter High School is not available for deposition on 1/28 as noticed by your office. In addition, as you know, we previously noticed Ms. Saghafi's deposition, which your office advised she was unavailable for. Therefore, we will insist that Ms. Saghafi's deposition be taken before any PCHS depositions.

You and I previously discussed placed a hold on discovery and depositions pending mediation. My client remains amenable to that and I think it's a good idea, especially given that the parties have completed an initial round of written discovery. Please let me know whether you have had a chance to consider putting a hold on all pending discovery (including depositions) pending mediation. Also, please let me know your thoughts on Diane Wayne or Steve Cerveris.

Thanks!

Ellen E. Cohen

Attorney at Law

Jackson Lewis P.C.

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EXHIBIT “4”

RE: ^_Saghafi^_ v. Palisades Charter High School

From: Cohen, Ellen E. (LA) (Ellen.Cohen@Jacksonlewis.com)

To: hull_ann@yahoo.com; hannahjune.esq@gmail.com

Date: Tuesday, January 22, 2019, 12:14 PM PST

Thank you Ann. I will coordinate with Hannah. In the meantime, please confirm that the PMK deposition is off for 1/28.

Thank you!

Ellen E. Cohen

Attorney at Law

Jackson Lewis P.C.

725 South Figueroa Street
Suite 2500

Los Angeles, CA 90017

Direct: (213) 630-8240 | Main: (213) 689-0404

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From: ann hull <hull_ann@yahoo.com>

Sent: Tuesday, January 15, 2019 7:36 PM

To: Cohen, Ellen E. (LA) <Ellen.Cohen@Jacksonlewis.com>; Hannah Robinson <hannahjune.esq@gmail.com>; ann hull <hull_ann@yahoo.com>

Subject: Re: Saghafi v. Palisades Charter High School

Hi Ellen,

I am including Hannah Robinson, an attorney at my firm, on this email. Hannah handles our Plaintiff's depositions. We like to start them on Mondays and reserve the next two days in case the deposition goes more than one day. Please coordinate Ms. Saghafi's deposition scheduling with Hannah.

Ms. Saghafi does not want to hold off on discovery and is feels that any out of court resolution should begin with discussions between counsel. She does not believe it is appropriate at this time to commit money to mediation until she knows what is the school had in mind. She has expressed that each year she continues teaching at the school will result in increased retirement for her.

If you have any questions, please feel free to reach out to me.

Sincerely,

Ann Hull

cc: Roya Saghafi

[Sent from Yahoo Mail for iPhone](#)

On Tuesday, January 15, 2019, 8:50 AM, Cohen, Ellen E. (LA) <Ellen.Cohen@Jacksonlewis.com> wrote:

Ann:

Please be advised that the PMK for Palisades Charter High School is not available for deposition on 1/28 as noticed by your office. In addition, as you know, we previously noticed Ms. Saghafi's deposition, which your office advised she was unavailable for. Therefore, we will insist that Ms. Saghafi's deposition be taken before any PCHS depositions.

You and I previously discussed placed a hold on discovery and depositions pending mediation. My client remains amenable to that and I think it's a good idea, especially given that the parties have completed an initial round of written discovery. Please let me know whether you have had a chance to consider putting a hold on all pending discovery (including depositions) pending mediation. Also, please let me know your thoughts on Diane Wayne or Steve Cerveris.

Thanks!

[Ellen E. Cohen](#)

Attorney at Law

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EXHIBIT “5”

Re: ^_Saghafi^_ v. Palisades Charter High School

From: Hannah R (hannahjune.esq@gmail.com)

To: Ellen.Cohen@jacksonlewis.com

Cc: hull_ann@yahoo.com

Date: Tuesday, January 22, 2019, 3:26 PM PST

Hi Ellen,

Good afternoon! I am pleased to be in touch with you regarding Ms. Saghafi's deposition. I have communicated with her regarding scheduling and we would like to suggest Monday, April 15 for Ms. Saghafi's deposition (and, as Ann mentioned, I will also reserve the 16th and 17th in my schedule).

Please advise if this date works for your office. I look forward to meeting you.

Yours,

Hannah Robinson

On Tue, Jan 22, 2019 at 12:14 PM Cohen, Ellen E. (LA) <Ellen.Cohen@jacksonlewis.com> wrote:

Thank you Ann. I will coordinate with Hannah. In the meantime, please confirm that the PMK deposition is off for 1/28.

Thank you!

Ellen E. Cohen

Attorney at Law

Jackson Lewis P.C.

725 South Figueroa Street
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From: ann hull <hull_ann@yahoo.com>

Sent: Tuesday, January 15, 2019 7:36 PM

To: Cohen, Ellen E. (LA) <Ellen.Cohen@Jacksonlewis.com>; Hannah Robinson <hannahjune.esq@gmail.com>; ann hull <hull_ann@yahoo.com>

Subject: Re: Saghafi v. Palisades Charter High School

Hi Ellen,

I am including Hannah Robinson, an attorney at my firm, on this email. Hannah handles our Plaintiff's depositions. We like to start them on Mondays and reserve the next two days in case the deposition goes more than one day. Please coordinate Ms. Saghafi's deposition scheduling with Hannah.

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If you have any questions, please feel free to reach out to me.

Sincerely,

Ann Hull

cc: Roya Saghafi

[Sent from Yahoo Mail for iPhone](#)

On Tuesday, January 15, 2019, 8:50 AM, Cohen, Ellen E. (LA)
<Ellen.Cohen@Jacksonlewis.com> wrote:

Ann:

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Thanks!

[Ellen E. Cohen](#)

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--

Hannah J. Robinson, Esq.

[California Bar Member #304481](#)

EXHIBIT “6”

Re: ^_Saghafi^_ v. Palisades Charter High School

From: Cohen, Ellen E. (LA) (Ellen.Cohen@Jacksonlewis.com)

To: hull_ann@yahoo.com; hannahjune.esq@gmail.com

Cc: staff_member_3@yahoo.com

Date: Thursday, February 28, 2019, 8:24 PM PST

April 17 and 19 works! Thanks Ann. I will get a notice out.

On: 28 February 2019 20:09, "ann hull" <hull_ann@yahoo.com> wrote:

Ms. Saghafi's deposition must take place while she is on spring break. If is my understanding that she has been reprimanded when she has had to take time off during the time period when classes are in session because substitutes must be brought in which is very difficult with science classes.

I have a jury trial starting April 8th and which will most likely go for 3 weeks. After that, the Palmdale school shooting case starts May 9th.

Why not the 17th and 19th, as Hannah suggested?

Ann A. Hull
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Offices now also in San Bernardino and Lancaster/Palmdale.

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On Thursday, February 28, 2019, 2:08:10 PM PST, Hannah R <hannahjune.esq@gmail.com> wrote:

Hi Ellen,

It sounds like Ms. Saghafi's availability is limited to April 18-19 (Thurs/Fri); I am available on Friday, April 19, if defense counsel thinks they can finish in one business day. (April 18 is my last day of class where I teach at

Loyola Law School).

Alternatively, I could also do April 15-16 (Mon/Tues) if Ms. Saghafi is able to reschedule her vacation.

Or Ann might have availability to cover April 18-19

I could also come in on Saturday, April 20th, if that works for defense counsel. It's Easter weekend so I'm not sure how feasible this would be for your firm.

Yours,

Hannah Robinson, Esq.

On Tue, Feb 26, 2019 at 1:16 PM Cohen, Ellen E. (LA) <Ellen.Cohen@jacksonlewis.com> wrote:

All:

Following up on the email below. Please let us know what dates work for Ms. Saghafi's deposition. If we are unable to agree on deposition dates, we will have to unilaterally notice the deposition (which I would like to avoid doing). Thank you!

Ellen E. Cohen

Attorney at Law

Jackson Lewis P.C.

725 South Figueroa Street
Suite 2500

Los Angeles, CA 90017

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From: ann hull <hull_ann@yahoo.com>

Sent: Wednesday, February 13, 2019 7:51 AM

To: Hannah R <hannahjune.esq@gmail.com>; Cohen, Ellen E. (LA) <Ellen.Cohen@Jacksonlewis.com>; Roya Saghafi <shaparak007@aol.com>; ann hull <hull_ann@yahoo.com>

Subject: Re: FW: Saghafi v. Palisades Charter High School

Hi Everybody,

I am including Ms. Saghafi is a teacher and I understand that she teaches science classes with labs and

also has students who need the labs in order to fulfill their educational needs. This is why she has specifically requested that her deposition be conducted on spring break.

Roya, can you please reply to all if the proposed dates are okay for your schedule?

Sincerely,

Ann Hull

[Sent from Yahoo Mail for iPhone](#)

On Tuesday, February 12, 2019, 10:19 PM, Hannah R <hannahjune.esq@gmail.com> wrote:

Hi Ellen,

Thank you for filling us in on your schedule. How about starting on Wednesday, April 17 and then, if necessary, picking back up on Friday, April 19? I can be available on some Fridays, including that one.

Yours,

Hannah

On Mon, Feb 11, 2019 at 12:37 PM Cohen, Ellen E. (LA) <Ellen.Cohen@jacksonlewis.com> wrote:

Ann and Hannah

Following up on my last email regarding deposition dates for Ms. Saghafi. As I previously noted, I am going on a pre-planned spring break trip with my children from April 13-16. Therefore, during spring break, I am only available on April 17 or 18. Otherwise, I can usually do Mondays. Please let me know what works on your end.

Thanks so much!

[Ellen E. Cohen](#)

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From: Cohen, Ellen E. (LA) <Ellen.Cohen@Jacksonlewis.com>

Sent: Monday, February 4, 2019 12:43 PM

To: 'ann hull' <hull_ann@yahoo.com>; Hannah R <hannahjune.esq@gmail.com>

Cc: Staff Member <staff_member_3@yahoo.com>; Staff Member 4 <staff_member_4@yahoo.com>; Onnalise Wright <assistant2ann@yahoo.com>

Subject: RE: Saghafi v. Palisades Charter High School

That's fine. However, I am going to be out of town the first three days of spring break with my children. Therefore, if the deposition has to be during spring break, I can only do the 17th or 18th. If we can do it some other week, Mondays are not a problem for me.

Ellen E. Cohen

Attorney at Law

Jackson Lewis P.C.

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From: ann hull <hull_ann@yahoo.com>

Sent: Monday, February 4, 2019 12:41 PM

To: Hannah R <hannahjune.esq@gmail.com>; Cohen, Ellen E. (LA)

<Ellen.Cohen@Jacksonlewis.com>

Cc: Staff Member <staff_member_3@yahoo.com>; Staff Member 4 <staff_member_4@yahoo.com>; Onnalise Wright <assistant2ann@yahoo.com>
Subject: Re: Saghafi v. Palisades Charter High School

Hi Ellen,

Just a reminder that we also need deposition dates for Ms. Nguyen.

Hannah handles out Plaintiff's depositions. She is on staff at Loyola Law School and wrks there Thursdays and Fridays. So Plaintiff's depositions need to start on a Monday.

Ann

Ann A. Hull
Law Offices of Ann A. Hull, Inc.
21900 Burbank Blvd., Third Floor

Woodland Hills, CA 91367

Office: (818) 992-2924

Fax: (818) 322-1321

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On Monday, February 4, 2019, 12:38:38 PM PST, Cohen, Ellen E. (LA)

<Ellen.Cohen@Jacksonlewis.com> wrote:

Hanna

I can't do April 15-17 (as it looks like I may also be out of town for spring break with my kids) but can do April 18 or 19. Please let me know whether these dates work for you and your client.

Thanks!

Ellen E. Cohen

Attorney at Law

Jackson Lewis P.C.

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From: ann hull <hull_ann@yahoo.com>

Sent: Friday, February 1, 2019 12:53 PM

To: Hannah R <hannahjune.esq@gmail.com>; Cohen, Ellen E. (LA) <Ellen.Cohen@Jacksonlewis.com>; ann hull <hull_ann@yahoo.com>

Cc: Staff Member <staff_member_3@yahoo.com>; Staff Member 4 <staff_member_4@yahoo.com>; Onnalise Wright <assistant2ann@yahoo.com>

Subject: Re: Saghafi v. Palisades Charter High School

Please see the email below. I believe Hannah has already provided dates for you.

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Offices now also in San Bernardino and Lancaster/Palmdale.

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On Friday, February 1, 2019, 12:07:37 PM PST, Cohen, Ellen E. (LA)
<Ellen.Cohen@Jacksonlewis.com> wrote:

Please let me know when spring break is and what dates work. Thank you!

[Ellen E. Cohen](#)

Attorney at Law

Jackson Lewis P.C.

725 South Figueroa Street

Suite 2500

Los Angeles, CA 90017

Direct: (213) 630-8240 | Main: (213) 689-0404

Ellen.Cohen@Jacksonlewis.com | www.jacksonlewis.com

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From: ann hull <hull_ann@yahoo.com>
Sent: Friday, January 25, 2019 11:33 AM
To: Hannah R <hannahjune.esq@gmail.com>; Cohen, Ellen E. (LA) <Ellen.Cohen@Jacksonlewis.com>
Cc: Staff Member <staff_member_3@yahoo.com>; Staff Member 4 <staff_member_4@yahoo.com>; Onnalise Wright <assistant2ann@yahoo.com>; ann hull <hull_ann@yahoo.com>
Subject: Re: Saghafi v. Palisades Charter High School

I think Ms. Saghafi stated that the depo has to take place during spring break. She teaches Honors Chemistry and is involved with other school activities that she can not miss.

[Sent from Yahoo Mail for iPhone](#)

On Friday, January 25, 2019, 11:19 AM, Hannah R <hannahjune.esq@gmail.com> wrote:

Hi Ellen,

I generally focus on the scheduling of Plaintiff's depositions, but perhaps someone from Ann's staff can confirm a good date for the PMK deposition (probably after April 15, as you suggest).

I look forward to hearing from you again about Ms. Saghafi's deposition.

Yours,

Hannah

On Wed, Jan 23, 2019 at 8:02 AM Cohen, Ellen E. (LA) <Ellen.Cohen@jacksonlewis.com> wrote:

I will check. Do you have proposed alternative dates for the pmk deposition?

On: 22 January 2019 15:26,

[Ellen E. Cohen](#)
Attorney at Law
Jackson Lewis P.C.
725 South Figueroa Street

Suite 2500

Los Angeles, CA 90017

Direct: (213) 630-8240 | Main: (213) 689-0404

Ellen.Cohen@JacksonLewis.com | www.jacksonlewis.com

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"Hannah R" <hannahjune.esq@gmail.com> wrote:

Hi Ellen,

Good afternoon! I am pleased to be in touch with you regarding Ms. Saghafi's deposition. I have communicated with her regarding scheduling and we would like to suggest Monday, April 15 for Ms. Saghafi's deposition (and, as Ann mentioned, I will also reserve the 16th and 17th in my schedule).

Please advise if this date works for your office. I look forward to meeting you.

Yours,

Hannah Robinson

On Tue, Jan 22, 2019 at 12:14 PM Cohen, Ellen E. (LA) <Ellen.Cohen@jacksonlewis.com> wrote:

Thank you Ann. I will coordinate with Hannah. In the meantime, please confirm that the PMK deposition is off for 1/28.

Thank you!

[Ellen E. Cohen](#)

Attorney at Law

Jackson Lewis P.C.

725 South Figueroa Street

Suite 2500

Los Angeles, CA 90017

Direct: (213) 630-8240 | Main: (213) 689-0404

Ellen.Cohen@JacksonLewis.com | www.jacksonlewis.com

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From: ann hull <hull_ann@yahoo.com>
Sent: Tuesday, January 15, 2019 7:36 PM
To: Cohen, Ellen E. (LA) <Ellen.Cohen@Jacksonlewis.com>; Hannah Robinson <hannahjune.esq@gmail.com>; ann hull <hull_ann@yahoo.com>
Subject: Re: Saghafi v. Palisades Charter High School

Hi Ellen,

I am including Hannah Robinson, an attorney at my firm, on this email. Hannah handles our Plaintiff's depositions. We like to start them on Mondays and reserve the next two days in case the deposition goes more than one day. Please coordinate Ms. Saghafi's deposition scheduling with Hannah.

Ms. Saghafi does not want to hold off on discovery and is feels that any out of court resolution should begin with discussions between counsel. She does not believe it is appropriate at this time to commit money to mediation until she knows what is the school had in mind. She has expressed that each year she continues teaching at the school will result in increased retirement for her.

If you have any questions, please feel free to reach out to me.

Sincerely,

Ann Hull

cc: Roya Saghafi

[Sent from Yahoo Mail for iPhone](#)

On Tuesday, January 15, 2019, 8:50 AM, Cohen, Ellen E. (LA) <Ellen.Cohen@Jacksonlewis.com> wrote:

Ann:

Please be advised that the PMK for Palisades Charter High School is not available for deposition on 1/28 as noticed by your office. In addition, as you know, we previously noticed Ms. Saghafi's deposition, which your office advised she was unavailable for. Therefore, we will insist that Ms. Saghafi's deposition be taken before any PCHS depositions.

You and I previously discussed placed a hold on discovery and depositions pending mediation. My client remains amenable to that and I think it's a good idea, especially given that the parties have completed an initial round of written discovery. Please let me know whether you have had a chance to consider putting a hold on all pending discovery (including depositions) pending mediation. Also, please let me know your thoughts on Diane Wayne or Steve Cerveris.

Thanks!

[Ellen E. Cohen](#)

Attorney at Law

Jackson Lewis P.C.

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Suite 2500

Los Angeles, CA 90017

Direct: (213) 630-8240 | Main: (213) 689-0404

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--

Hannah J. Robinson, Esq.

[California Bar Member #304481](#)

--

Hannah J. Robinson, Esq.

[California Bar Member #304481](#)

--

Hannah J. Robinson, Esq.

[California Bar Member #304481](#)

--

Hannah J. Robinson, Esq.

[California Bar Member #304481](#)

EXHIBIT “7”

^_Saghafi^_ v. Palisades Charter High School

From: Cohen, Ellen E. (LA) (Ellen.Cohen@Jacksonlewis.com)
To: hull_ann@yahoo.com
Cc: assistant2ann@yahoo.com; hannahjune.esq@gmail.com
Date: Tuesday, March 19, 2019, 4:38 PM PDT

Ms. Hull

Ms. Nguyen, who is also the school's PMK with respect to many of the categories, is available for deposition on April 22, 23 and 24. Do any of these dates work for you?

Ellen E. Cohen

Attorney at Law

Jackson Lewis P.C.

725 South Figueroa Street
Suite 2500

Los Angeles, CA 90017

Direct: (213) 630-8240 | Main: (213) 689-0404

Ellen.Cohen@Jacksonlewis.com | www.jacksonlewis.com

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EXHIBIT “8”

^_Saghafi^_ v. PCHS

From: Cohen, Ellen E. (LA) (Ellen.Cohen@Jacksonlewis.com)

To: hull_ann@yahoo.com

Date: Tuesday, April 23, 2019, 3:49 PM PDT

Ann:

In anticipation of tomorrow's deposition, please find attached PCHS's supplemental document production.

Ellen E. Cohen

Attorney at Law

Jackson Lewis P.C.

725 South Figueroa Street

Suite 2500

Los Angeles, CA 90017

Direct: (213) 630-8240 | Main: (213) 689-0404

Ellen.Cohen@Jacksonlewis.com | www.jacksonlewis.com

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PCHS 01869 - PCHS 02009.pdf

5.2MB



PCHS 01739 - PCHS 01868.pdf

4MB

EXHIBIT “9”

Re: ^_Saghafi^_ v. PCHS

From: ann hull (hull_ann@yahoo.com)

To: Ellen.Cohen@Jacksonlewis.com; hull_ann@yahoo.com

Date: Tuesday, April 23, 2019, 8:44 PM PDT

Thank you for providing these documents the night before the deposition.

I note from the numbers on the bates documents that it appears that Defendants have withheld hundreds of documents. Please provide us with the bates number of the documents that are being withheld so that we can confirm that we are not missing anything.

Ann A. Hull
Law Offices of Ann A. Hull, Inc.
21900 Burbank Blvd., Third Floor
Woodland Hills, CA 91367
Office: (818) 992-2924
Fax: (818) 322-1321

Offices now also in San Bernardino and Lancaster/Palmdale.

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On Tuesday, April 23, 2019, 3:49:28 PM PDT, Cohen, Ellen E. (LA) <Ellen.Cohen@Jacksonlewis.com> wrote:

Ann:

In anticipation of tomorrow's deposition, please find attached PCHS's supplemental document production.

Ellen E. Cohen
Attorney at Law
Jackson Lewis P.C.
725 South Figueroa Street
Suite 2500
Los Angeles, CA 90017
Direct: (213) 630-8240 | Main: (213) 689-0404

Ellen.Cohen@Jacksonlewis.com | www.jacksonlewis.com

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EXHIBIT “10”

Roya ^_Saghafi^_ v. Palisades Charter High School, et al.

From: Escalante, Arthur L. (LA) (arthur.escalante@jacksonlewis.com)

To: hull_ann@yahoo.com

Date: Wednesday, April 24, 2019, 11:05 AM PDT

Sender : Escalante, Arthur L. (LA)

Link : <https://securetransfer.jacksonlewis.com/bds/Login.do?id=A0539386075&p1=dej114jsbgekejhbglbgjjgk20>

Sent To : hull_ann@yahoo.com

Cc : Cohen, Ellen E. (LA)

Expires : 5/25/19 12:00:00 AM EDT

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EXHIBIT “11”

Saghafi vs. Palisades Charter High School - OUR FILE NO.: AD03C96

From: Atkinson-Baker Transcripts (transcripts@depo.com)

To: hull_ann@yahoo.com

Date: Monday, May 13, 2019, 11:40 AM PDT

AMY NGUYEN

WOODLAND HILLS, CALIFORNIA

WEDNESDAY, APRIL 24, 2019

|

-

[Click here to download Transcript](#)

You do not need a log-in or user account.

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3. Follow prompts

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Attachments.html

6.2kB

EXHIBIT “12”

Ann A. Hull

LAW OFFICES OF ANN A. HULL, INC.

21900 Burbank Blvd., Third Floor

Woodland Hills, CA 91367

www.annhull.com

Main Number: (818) 992-2924

Fax: (818) 322-1321

hull_ann@yahoo.com

May 12, 2019

Sent by US Mail and Email (Theresa.marchlewski@jacksonlewis.com)

Theresa Marchlewski

Ellen E. Cohen

JACKSON LEWIS P.C.

725 South Figueroa Street, Suite 2500

Los Angeles, CA 90017

CASE NO.: BC708497

CASE NAME: Roya Saghafi v. Palisades Charter High School

RE: Witnesses To Be Deposed

Dear Counsel:

I am contacting you to following up on the scheduling of depositions. Ms. Saghafi identified the following witnesses which she intends to have deposed:

1. Dr. Magee
2. Amy Nguyen
3. Dr. Lee
4. Russell Howard
5. Rich Steil
6. James Buckman
7. Mary Bush
8. Jeff Hartman
9. Monica Iannasa
10. Martin [last name unknown] – The principal whose evaluation was brought up in Plaintiff's deposition
11. Marsha Haskin – previous principal
12. Carole Smith
13. Grant Smith
14. Karen Newbill
15. Karen Perkins
16. Sharon King
17. Kevin Kung
18. Catherine Villagran

19. Kelly Loftus - Dean
20. Jim Schiffman
21. Bella McGowen –school psychologist during June of 2017
22. Eleanor Rozell – Former payroll employee.
23. Catherine Villagran –French teacher
24. Sophia Chuck

Please advise me at your earliest convenience which of these witnesses will be represented by your firm, and which will not be. Of those whom your firm will represent at the depositions, please provide dates on which these depositions can go forward.

Ms. Saghafi also has more than a dozen additional percipient witnesses who she intends to be deposed, which are not employees of the school. This includes, but is not limited to, parents, students, people from Nicole Miller and Associates, the police officers who came to her home, people from Shaw HR Consulting, etc. As the discovery cut-off is approaching, please advise me of days when you are available, as we need to send out subpoenas in the next few days.

Sincerely,

//s// Ann A. Hull //s//
Electronically Signed
Attorney for Plaintiff
ROYA SAGHAFI

cc: Roya Saghafi

EXHIBIT “13”

Ann A. Hull

LAW OFFICES OF ANN A. HULL, INC.

21900 Burbank Blvd., Third Floor

Woodland Hills, CA 91367

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Main Number: (818) 992-2924

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hull_ann@yahoo.com

May 14, 2019

Sent by US Mail & Email Theresa.marchlewski@jacksonlewis.com and
ellen.cohen@jacksonlewi.com

Theresa Marchlewski

Ellen E. Cohen

JACKSON LEWIS P.C.

725 South Figueroa Street, Suite 2500

Los Angeles, CA 90017

CASE NO.: BC708497

CASE NAME: Roya Saghafi v. Palisades Charter High School

RE: Depositions

Dear Ms. Marchlewski:

Attached please find Notice of Deposition of Dr. Pamela Magee and of Dr. Chris Lee. We have selected these dates, if these dates do not work for you, please advise us with new dates that do work for you.

If you have any questions, please contact our office.

Sincerely,

LAW OFFICES OF ANN A. HULL, INC.



Karen Bonito

Paralegal to Attorney Ann A. Hull

Email: assistant2ann@yahoo.com

EXHIBIT “14”

Ann A. Hull

LAW OFFICES OF ANN A. HULL, INC.

21900 Burbank Blvd., Third Floor

Woodland Hills, CA 91367

www.annhull.com

Main Number: (818) 992-2924

Fax: (818) 322-1321

hull_ann@yahoo.com

June 5, 2019

Sent by US Mail & Email Theresa.marchlewski@jacksonlewis.com

Theresa Marchlewski

Ellen E. Cohen

JACKSON LEWIS P.C.

725 South Figueroa Street, Suite 2500

Los Angeles, CA 90017

CASE NO.: BC708497

CASE NAME: Roya Saghafi v. Palisades Charter High School

RE: Meet and Confer Letter re: Dates for Depositions
and Continuation of Trial

Dear Counsel:

Plaintiff, Roya Saghafi, identified a number of persons as percipient witnesses. We have been trying to schedule depositions of a number of them for months.

Please review the people listed below and advise me which persons will be represented by your law firm, and which are not represented. Of those who are represented, please provide me with dates on which to conduct their depositions at your earliest convenience. If we do not hear from you, we will assume that these people are not represented.

1. Sophia Chuck – was in charge of credentials
2. Dr. Magee
3. Amy Nguyen
4. Dr. Lee
5. Russell Howard
6. Rich Steil
7. James Buckman

8. Mary Bush
9. Jeff Hartman
10. Monica Iannasa
11. Martin – the principal whose evaluation was brought up in my deposition
12. Marsha Haskin – previous principal
13. Carole Smith
14. Grant Smith
15. Karen Newbill – department chair
16. Karen Perkins
17. Sharon King
18. Kevin Kung
19. Catherine Villagran
20. Kelly Loftus - Dean
21. Dara Williams (a parent/lawyer who has communicated that he/she has spoken on behalf of the school).
- 22/23. Jamie and Stephanie Katzman (This is a father/employment lawyer and mother in education. The father apparently communicated that he was associated with the school).

We understand that the scheduling of depositions has been difficult due to the school schedule. For this reason, and due to extensive number of witnesses generally, we intend to request a continuance of the trial date. This is another request as to whether your clients will stipulate to continue the trial? Please let me know.

If you have any questions, please me know.

Sincerely,

LAW OFFICES OF ANN A. HULL, INC.



Ann A. Hull

EXHIBIT “15”

Ann A. Hull

LAW OFFICES OF ANN A. HULL, INC.

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Woodland Hills, CA 91367

www.annhull.com

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Fax: (818) 322-1321

Offices now also in San Bernardino and Lancaster/Palmdale

June 16, 2019

Sent by US Mail & Email Theresa.marchlewski@jacksonlewis.com and
ellen.cohen@jacksonlewi.com

Theresa Marchlewski

Ellen E. Cohen

JACKSON LEWIS P.C.

725 South Figueroa Street, Suite 2500

Los Angeles, CA 90017

CASE NO.: BC708497

CASE NAME: Roya Saghafi v. Palisades Charter High School

RE: Missing Bates Documents From Defendants

Dear Ms. Marchlewski and Ms. Cohen:

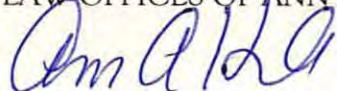
In preparing for tomorrow's deposition, it is clear that Defendants are withholding hundreds of documents. We received bates documents marked as NGUYEN 1 -196, and PCHS 1739 - 2305, but not PCHS 1 - 1738. I searched my firm's files, email, and correspondence and have no record of PCHS 1 - 1738.

Although Plaintiff's three-day deposition was conducted in April of 2019, we have still not received Volumes 1 and 2 of Plaintiff's transcript. Volume 3, which was recently received, includes an exhibit marked as PCHS 00717-718), which I had never seen before.

Plaintiff demands that all responsive documents be produced immediately, and reserves the right to continue any depositions that relate to any of Defendants documents that have been withheld.

Sincerely,

LAW OFFICES OF ANN A. HULL, INC.



Ann A. Hull

EXHIBIT “16”

Ann A. Hull

LAW OFFICES OF ANN A. HULL, INC.

21900 Burbank Blvd., Third Floor

Woodland Hills, CA 91367

www.annhull.com

Main Office: (818) 992-2924

Fax: (818) 322-1321

Offices now also in San Bernardino and Lancaster/Palmdale

June 18, 2019

Sent by US Mail & Email Theresa.marchlewski@jacksonlewis.com and
ellen.cohen@jacksonlewi.com

Theresa Marchlewski

Ellen E. Cohen

JACKSON LEWIS P.C.

725 South Figueroa Street, Suite 2500

Los Angeles, CA 90017

CASE NO.: BC708497

CASE NAME: Roya Saghafi v. Palisades Charter High School

RE: Missing Bates Documents From Defendants

Dear Ms. Marchlewski and Ms. Cohen:

This letter is sent in a continuing effort to meet and confer concerning Defendants' refusal to provide Plaintiff with bates documents PCHS 1 - 1738, and the transcript to volumes 1 and 2 of Plaintiff's deposition.

As of today, defendants provided a "link" to an internet site that are purported to contain the documents, but no password by which the cite can be assessed. Contrary to promises to provide a flash drive and the actual documents, no such documents have been received.

Plaintiff demands that all responsive documents be produced immediately.

Sincerely,

LAW OFFICES OF ANN A. HULL, INC.



Ann A. Hull

EXHIBIT “17”

Ann A. Hull

LAW OFFICES OF ANN A. HULL, INC.

21900 Burbank Blvd., Third Floor

Woodland Hills, CA 91367

www.annhull.com

Main Office: (818) 992-2924

Fax: (818) 322-1321

Offices now also in San Bernardino and Lancaster/Palmdale

June 19, 2019

Sent by US Mail & Email Theresa.marchlewski@jacksonlewis.com and
ellen.cohen@jacksonlewi.com

Theresa Marchlewski

Ellen E. Cohen

JACKSON LEWIS P.C.

725 South Figueroa Street, Suite 2500

Los Angeles, CA 90017

CASE NO.: BC708497

CASE NAME: Roya Saghafi v. Palisades Charter High School

RE: Ex Parte Notice

Dear Ms. Marchlewski and Ms. Cohen:

On Monday, June 24, 2019, at 8:30 a.m. or as soon thereafter as the matter may be heard, Plaintiff will appear *ex parte* in Department 72 of the Los Angeles Superior Court, located at 111 N. Hill Street, Los Angeles, CA. 90012, to ask the Court to continue the trial in this case.

Sincerely,

LAW OFFICES OF ANN A. HULL, INC.



Ann A. Hull

SAGHAFI -- Ex Parte Notice

From: ann hull (hull_ann@yahoo.com)

To: jeff@jeffschwartzlaw.com; hull_ann@yahoo.com; ellen.cohen@jacksonlewis.com;
theresa.marchlewski@jacksonlewis.com

Date: Thursday, June 20, 2019, 8:53 PM PDT

This is to inform you that an ex parte hearing in the matter of Saghafi v. Palisades Charter High School, case no. BC708497, will take place on June 24, 2019 at 8:30 a.m., in Dept. 72 of the Los Angeles County Superior Court located at 111 N. Hill Street, Los Angeles, CA 90012. The Court will hear my application for a trial continuance or, in the alternative, an order shortening time to hear a noticed motion. Please let me know if someone will attend the hearing and whether they oppose the application, so that I can inform the court.

Ann A. Hull
Law Offices of Ann A. Hull, Inc.
21900 Burbank Blvd., Third Floor
Woodland Hills, CA 91367
Office: (818) 992-2924
Fax: (818) 322-1321

Please note that Ms. Hull sometimes uses electronic dictation software, which may result in spelling and grammar errors.

Offices now also in San Bernardino and Lancaster/Palmdale.

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PROOF OF SERVICE

I am a resident of the State of California over the age of eighteen year, and not a party to the within action. My business address is: LAW OFFICES OF ANN A. HULL, INC., 21900 Burbank Blvd., 3rd Floor, Woodland Hills, California 91367. On **June 20, 2019**, I served the within documents:

DECLARATION OF ANN A. HULL ISO MOTION TO CONTINUE TRIAL

- by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m.
- by personally delivering the document(s) listed above to the person(s) at the address(es) set forth below.
- X by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in United States mail in the State of California at Woodland Hills, addressed as set forth below. AND BY EMAIL


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Attorneys for Defendants

I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after the date of deposit for mailing in affidavit.

I declare under the penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on **June 20, 2019** at Woodland Hills, California.



Ann Hull